

Food Defense Plan*

Security Measures for Food Defense for Siluriformes Fish ** Farmers and Processors

Facility or (Company) Name: _____

Location: _____

FSIS Establishment Number: _____

By signing here, I acknowledge that this establishment has measures in place in accordance with this document

Print Name: _____ Title: _____

Signature: _____ Date: _____

*This plan was developed through a joint effort between industry representatives, RTI International, the HACCP Consulting Group, and the U.S. Department of Agriculture's Food and Inspection Service.

**The term "Siluriformes fish" is defined by the 2014 Farm Bill which amended the Federal Meat Inspection Act to remove the term fish and make " fish of the order Siluriformes and products derived from these fish" subject to FSIS jurisdiction and inspection.

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Introduction

Food Defense Plan Security Measures for Food Defense for Siluriformes Fish: Farmers and Processors

Food Defense is having measures in place to reduce the chances of someone intentionally contaminating the food supply in order to kill or hurt people, disrupt our economy, or ruin your business.

PURPOSE:

This voluntary plan documents measures to protect fish products and farms and/or food production businesses from intentional harm. *Completion of this template by FSIS-regulated establishments will result in a food defense plan.*

BENEFITS: By having a Food Defense Plan, you will contribute to a safer and more secure food supply. You will also protect public health, your employees, and your livelihood. Having a food defense plan in place supports the goals of the Homeland Security Presidential Directive 9: *Defense of United States Agriculture and Food*. A functional food defense plan may also:

- (1) improve public confidence in the safety and security of the fish food supply;
- (2) reflect a commitment to positive, proactive steps to protect fish products;
- (3) increase communication and efficiency of the operation;
- (4) reduce the potential for theft;
- (5) reduce the need for additional regulations on food defense;
- (6) reduce the risk that intentional acts will result in unsafe product and economic loss;
- (7) reduce insurance rates; and
- (8) reduce the potential risk of company liability.

INSTRUCTIONS:

1. In each section, mark the box(es) for measures that are currently in place or that you will implement with this plan. Not all boxes need to be checked. ***Not all measures are appropriate or necessary for every facility.***
2. In the large boxes below each subsection, write down any additional security measures in place.
3. Read and sign the front page of this Food Defense Plan.

This Food Defense Plan is divided into three main sections: (1) all fish businesses, (2) fish producers or farms, and (3) fish processors. The producer and processor sections have subsections for specific areas within the operation.

Please review the entire document and focus on those sections that pertain to your activities. Compare the recommendations in this document with current procedures and controls to address potential intentional contamination and consider adding measures to your process or plans where appropriate.

This Food Defense Plan may include many address potential intentional contamination and consider adding measures to your process or plans where appropriate. This Food Defense Plan may include many security measures already in place for your facility. You may have other plans that contribute to a food defense plan such as an emergency plan, a recall plan, and a security plan. These can be referenced in the boxes provided.

This document provides information on tools or additional security measures that you may also consider or already have in place.

Additional guidance is available at: <http://www.fsis.usda.gov/fooddefense>

***These four elements make up a *functional* food defense plan:**

- 1. Develop:** Completing this document fulfills this element.

- 2. Implement:** When the measures marked or listed by the facility are in place and being used, this element is fulfilled.

- 3 Test:** Periodic monitoring fulfills this element. Monitoring can be done using simple measures, such as checking locked doors or making unannounced perimeter checks. Monitoring can be documented using a form, such as **Attachment A**. Not all security measures need to be tested at the same frequency.

- 4. Review and Maintain:** Review the plan at least annually, revise the plan as needed, and take appropriate actions.

Once this food defense plan is created, it will continue to be functional as plant managers continue to review the procedures. Reviewing the procedures can be documented using the worksheet provided in Attachment A. Consider implementing new, or additional, tools or measures, as needed, each time the plan is reviewed.

Food Defense Plan Management

1.1 General Plan Security

GOAL: To implement, maintain, and update this plan and other related plans as needed.

- A person or team is designated with responsibility to implement, manage, and update the Food Defense Plan
- A product recall plan is maintained and periodically reviewed.
- Key personnel are trained in product recall/withdraw procedures.

Any additional measures or plans (i.e., security plan, crisis plan, evacuation plan) that may contribute to the food defense plan are listed, attached, or documented in locations as described below.

1.2 General Security Training

GOAL: To communicate plans to employees and ensure awareness.

- Awareness training on security measures is provided to all employees, including new hires.
- Refresher awareness training on security measures is offered to employees periodically.
- Employees are trained to report suspicious activities or unusual observations.

Any additional measures in use for security training are listed below.

1.3 General Information Security

GOAL: To ensure sensitive information is protected.

- Access to sensitive information, such as files, site plans, and farm or processing details (e.g., flow charts, floor plans, blueprints, etc.), is controlled.
- Access to computer systems is protected through firewalls and/or passwords

Any additional measures in use for information security are listed below.

1.4 Concerns Investigating Security

GOAL: To encourage action before a concern becomes a food defense incident.

- Reporting of unusual activities is encouraged.
- Employees are trained and have the ability to stop activities to minimize a potential food defense incident.
- Reported security breaches (for example, alarms, suspicion of tampering) are investigated.
- Procedures ensure that suspect or adulterated product or potentially harmful substances are secured.
- Customer comments are investigated.

Any additional measures in use for investigating security concerns are listed below

1.5 Emergency Contacts for Security

GOAL: To contact assistance whenever needed.

- Plant personnel contact information is kept up-to-date.
- Emergency contact lists are kept up to-date.

Company and Emergency Contact List	Phone Number(s)
Manager	
Local FSIS Personnel	
FSIS Front Line Supervisor	
Local Police/Sheriff	
Other Assistance (extension agent, trade association)	

Any additional measures or names and contact number used for emergency contact security are listed below.

Security Measures for Production Farms

2.1 General Security for Production Farms

GOAL: To prevent unauthorized access by people or entry of unapproved materials to the facility.

- "No Trespassing" signs are posted, as appropriate.
- Farm personnel are instructed to watch for and report unauthorized persons on the farm.
- Any restricted areas are clearly marked where only authorized employees have access.
- Visitors, guests, or other non-employees are restricted to non-sensitive areas unless accompanied, or in accordance with facility policy.

Any additional measures in use for general security are listed below.

2.2 Production Facility Storage Security

GOAL: To protect items in storage from theft or contamination.

- Access to storage areas, including feed storage, is restricted.
- Security is maintained for restricted materials.
- Unusual changes to inventory are investigated.
- Employees are trained to report signs of potential tampering.

Any additional measures in use for storage security are listed below.

2.3 Production Facility Shipping/Receiving Security

GOAL: To protect items in transit from intentional contamination.

- Loading and unloading of vehicles transporting live fish are closely monitored.
 - If conducted by a third-party or harvest crew supervisor, ensure they have had food defense training.
- Chain-of-custody records are maintained for live trucks.
- Receipt of live product is verified by an authorized person, and incoming loads are checked for tampering.
- Feed is only received from federally inspected feed mills.
- Consideration is given to security when selecting transportation companies.

Security Measures for Production Farms

Any additional security measures in use for shipping/receiving are listed below

2.4 Production Facility Water/Ice Security

GOAL: To prevent intentional contamination of water or ice.

- Access is limited to water sources.
- Employees are instructed to watch for activity in the watershed area that could contaminate ponds.

Any additional measures in use for water/ice security are listed below.

2.5 Personnel Security for Production

GOAL: To reduce risk of intentional harm by people on the production farm.

- Farm employees are trained on security procedures.
- Temporary employees and contractors are instructed to stay only in areas relevant to their work.
- Refresher awareness training on security measures is offered to employees periodically.
- Employees are trained to report suspicious activities or unusual observations.

Any additional measures in use for personnel security are listed below.

Security Measures for Processing

3.1 Processing Facility - Outside Security

GOAL: To prevent unauthorized access by people or entry of unapproved materials to the facility.

- Plant grounds are secured to prevent unauthorized entry (for example, fences, installed, "No Trespassing: signs are posted.
- "No Trespassing" signs are posted.
- Outside lighting is present to deter unauthorized activities.
- Security is in place to control people and vehicles entering the plant and/or parking lot.
- Cameras are in place to monitor traffic/security.

Any additional measures in use for outside security are listed below.

3.2 Processing Facility - Inside Security

GOAL: To protect buildings and systems from intentional harm.

- An emergency lighting and alert system is installed and tested.
- Locations of controls for emergency alert systems are clearly labeled.
- Restricted areas are clearly marked.
- Inventory of keys to sensitive or secure areas is regularly checked.
- Access to the in-plant laboratory is restricted to authorized employees.
- Access to controls for the following systems is restricted:
 - heating, ventilation, air conditioning
 - water
 - gas (propane or natural gas)
 - electricity
 - disinfection or chemical delivery systems

Any additional measures in use for storage security are listed below.

3.3 Processing Security

GOAL: To protect product from intentional contamination throughout the production process.

- Access to product, production, and fish holding vats is restricted, to the extent possible.
- Prior to use, containers or packages are examined for signs of tampering.
- Records of rework use are maintained.
- A system to ensure traceability is in place.

Any additional measures in use for processing area security are listed below.

3.4 Processing Facility - Storage Security

GOAL: To protect items in storage from theft or contamination.

- Access to storage areas, including internal storage, external on-site storage, and cold and dry storage areas, is monitored.
- Inventory of finished product is checked regularly for unexplained changes.
- Access is limited to designated employees for inside and outside storage, including feed storage and storage for potentially hazardous materials (ie., pesticides, chemicals).

Any additional measures in use for storage security are listed below.

3.5 Processing Facility - Shipping/Receiving Security

GOAL: To protect items in transit from intentional contamination.

- Loaded trailers and tankers on these premises are kept locked or under observation when not being loaded or unloaded.
- Incoming shipments are secured with locks or seals and examined for potential tampering.
- Loading and unloading of vehicles transporting raw materials, live fish, materials used for processing or finished products is closely monitored.
- Incoming and outgoing vehicles are monitored for suspicious activity or evidence of tampering.
- Outgoing shipments are secured with tamper-evident locks, or seals and seal numbers (if used) are documented.
- Returned goods are examined in a separate designated area for evidence of tampering before accepting or using them.
- Records of returned goods are maintained.

Any additional security measures in use for shipping/receiving are listed below.

3.6 Processing Facility - Ingredients/Water/Ice Security

GOAL: To prevent intentional contamination of water or ice.

- Access to water sources is restricted by locked door/gate or limiting access to designated employees.
- Access to ice-making equipment and storage is limited.
- Access to storage tanks for potable water and to water reuse systems is limited.
- Potable water lines are inspected for possible tampering (e.g., visual inspection for physical integrity of infrastructure, connection to potable lines).
- Arrangements have been made with local health officials to ensure they will immediately notify the facility if the public water supply may be compromised.
- Restricted ingredients are controlled.
- Supplier food safety/security information is requested.

Any additional measures in use for ingredients/water/ice security are listed below.

3.7 Processing Facility Personnel Security

GOAL: To ensure that only authorized personnel are in the facility at any given time.

- A method to recognize or identify employees in the facility is in place.
- Background or reference checks are conducted for new hires.
- Employees and non-employees have restrictions on what they can bring in or take from the facility (e.g., personal items, cameras).
- Train all facility employees on food defense and security awareness and procedures as part of their orientation, new job, and annual refresher training.

Please list any additional measures in use for personnel security.

ATTACHMENT A

Food Defense Plan Review Form

Complete this form to document monitoring, testing, or reviewing of the security measures used for food defense. *Not all measures are required or need to be reviewed each time this form is completed.* All portions of the Defense Plan should be reviewed annually.

Programs or Measures Monitored, Tested, or Reviewed	Are the Programs or Measures Still in Place? Yes/No	Are Changes Needed Yes/No	Describe Planned Changes	Estimated Completion Date	Actual Completion Date

Date of review: _____ Person who conducted review: _____